

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ERNEST JETER,

**NOTICE OF  
CROSS-MOTION  
FOR SUMMARY  
JUDGMENT**

Plaintiff,

-against-

NEW YORK CITY DEPARTMENT OF EDUCATION  
OF THE CITY OF NEW YORK, NEW YORK CITY  
DEPARTMENT OF INVESTIGATION OF THE CITY  
OF NEW YORK, and THE OFFICE OF SPECIAL  
COMMISSIONER OF INVESTIGATION FOR NEW  
YORK CITY SCHOOL DISTRICT OF THE CITY OF  
NEW YORK, *et al.*,

06-CV-3687  
(NGG)(LB)

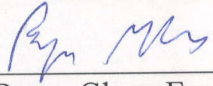
Defendants.  
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PLEASE TAKE NOTICE that, upon the annexed declaration of Bryan D. Glass, Esq., dated November 30, 2011, and upon all the prior proceedings had herein, Plaintiff, by his attorneys Glass Krakower LLP, will cross-move this Court before the Honorable Nicholas G. Garuifus, United States District Judge for the United States District Court for the Eastern District of New York, at the United States District Court, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure for summary judgment on the issue of liability in Plaintiff's favor as to the claim of retaliation against Plaintiff, and for such other and further relief as to this Court deems just and proper.

Dated: New York, New York  
November 30, 2011

GLASS KRAKOWER LLP

By:

  
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